

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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IN RE GENZYME CORP. SECURITIES)
LITIGATION)

Case No. 1:09-cv-11267-GAO

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) **ORAL ARGUMENT REQUESTED**
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**DEFENDANT GENZYME CORPORATION’S MOTION TO DISMISS
CONSOLIDATED CLASS ACTION COMPLAINT**

Defendant Genzyme Corporation (“Genzyme”) respectfully moves this Court for an order dismissing the Consolidated Class Action Complaint (the “Complaint”) filed by lead plaintiffs Deka International S.A. Luxembourg, the City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and the Government of Guam Retirement Fund (collectively, “Plaintiffs”), pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

The Complaint alleges violations of Section 10(b) of the Securities Exchange Act of 1934 and S.E.C. Rule 10b-5, by Genzyme and certain individual defendants. Genzyme moves to dismiss the Complaint on the grounds that Plaintiffs have failed to plead any actionable misstatement or omission, as explained in more detail in the accompanying Memorandum of Law in Support of Defendant Genzyme Corporation’s Motion to Dismiss Consolidated Class Action Complaint.

In support of this motion, Genzyme respectfully refers the Court to the following documents, filed concurrently herewith: (1) the Memorandum of Law in Support of Defendant

Genzyme Corporation's Motion to Dismiss Consolidated Class Action Complaint and attachments thereto; and (2) the Declaration of Alison E.H. McLaughlin in Support of Defendant Genzyme Corporation's Motion to Dismiss Consolidated Class Action Complaint and exhibits thereto.

For the foregoing reasons and as set forth in greater detail in the accompanying Memorandum of Law, Genzyme respectfully requests that the Court enter an order dismissing the Consolidated Class Action Complaint in its entirety.

REQUEST FOR ORAL ARGUMENT

Defendant Genzyme Corporation hereby respectfully requests oral argument on its Motion to Dismiss Consolidated Class Action Complaint.

Dated: June 2, 2010

Respectfully submitted,

/s/ John D. Donovan, Jr.

John D. Donovan, Jr. (BBO# 130950)

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Alison E.H. McLaughlin (BBO# 663060)

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, the accompanying Memorandum of Law and exhibits thereto, Declaration of Alison E.H. McLaughlin and exhibits thereto, each filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on June 2, 2010.

/s/ John D. Donovan, Jr.
John D. Donovan, Jr.

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that counsel for Genzyme Corporation has conferred in good faith with counsel for the Plaintiffs in an effort to narrow or resolve the issues raised in this motion and that counsel for the Plaintiffs has indicated that Plaintiffs do not consent to this motion.

/s/ John D. Donovan, Jr.
John D. Donovan, Jr.